



**GENERAL ALLEGATIONS AS TO ALL DEFENDANTS**

271. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 271 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

**JEFFREY DERDERIAN**

272. Defendant Daniel Biechele incorporates by reference his answers to all prior Paragraphs of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

273. Defendant Daniel Biechele is without knowledge or information as to Jeffrey Derderian's residence as set forth in Paragraph 273 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 273 of Plaintiffs' First Amended Master Complaint at this time.

274. through 275. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 274 through 275 of Plaintiffs' First Amended Master Complaint at this time.

276. Defendant Daniel Biechele is without knowledge or information of the truth or

falsity of the allegations set forth in Paragraph 276 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

277. through 279. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 277 through 279 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT I**  
**JEFFREY DERDERIAN—NEGLIGENCE**

280. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 279 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

281. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 281 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT II**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

282. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 279 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

283. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 283 of Plaintiffs' First Amended Master Complaint at this time.

**MICHAEL DERDERIAN**

284. Defendant Daniel Biechele is without knowledge or information as to Michael Derderian's residence as set forth in Paragraph 284 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 284 of Plaintiffs' First Amended Master Complaint at this time.

285. through 286. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 285 through 286 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT III**  
**MICHAEL DERDERIAN—NEGLIGENCE**

287. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 284 through 286 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

288. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 288 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT IV**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

289. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 284 through 286 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

290. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 290 of Plaintiffs' First Amended Master Complaint at this time.

**DERCO, LLC**

291. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 291 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

292. through 293. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 292 through 293 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT V**  
**DERCO, LLC—NEGLIGENCE**

294. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 291 through 293 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

295. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 295 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT VI**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**

**TITLE 9, CHAPTER 1, SECTION 2**

296. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 291 through 293 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

297. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 297 of Plaintiffs' First Amended Master Complaint at this time.

**HOWARD JULIAN**

298. Defendant Daniel Biechele is without knowledge or information as to Howard Julian's residence and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 298 of Plaintiffs' First Amended Master Complaint at this time.

299. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section

13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 299 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT VII**  
**HOWARD JULIAN—NEGLIGENCE**

300. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 298 through 299 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

301. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 301 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT VIII**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

302. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 298 through 299 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

303. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section

13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 303 of Plaintiffs' First Amended Master Complaint at this time.

**TRITON REALTY LIMITED PARTNERSHIP**

304. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 304 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

305. through 306. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 305 through 306 of Plaintiffs' First Amended Master Complaint at this time.

307. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 307 of Plaintiffs' Complaint and leaves Plaintiffs to their proof thereof.

**COUNT IX**  
**TRITON REALTY LIMITED PARTNERSHIP—NEGLIGENCE**

308. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 304 through 307 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

309. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele

has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 309 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT X**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

310. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 304 through 307 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

311. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 311 of Plaintiffs' First Amended Master Complaint at this time.

**TRITON REALTY, INC.**

312. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 312 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

313. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 313 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

314. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 314 of Plaintiffs' First Amended Master Complaint at this time.

315. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 315 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

**COUNT XI**  
**TRITON REALTY, INC.—NEGLIGENCE**

316. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 312 through 315 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

317. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 317 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XII**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

318. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 312 through 315 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

319. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 319 of Plaintiffs' First Amended Master Complaint at this time.

**RAYMOND J. VILLANOVA**

320. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 320 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

321. through 322. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 321 through 322 of Plaintiffs' First Amended Master Complaint at this time.

323. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 323 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

**COUNT XIII**  
**RAYMOND J. VILLANOVA—NEGLIGENCE**

324. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 320 through 323 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

325. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 325 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XIV**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

326. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 320 through 323 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

327. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 327 of Plaintiffs' First Amended Master Complaint at this time.

## **JACK RUSSELL**

328. Defendant Daniel Biechele admits that Jack Russell was a resident of California and lead singer of the band. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 328 of Plaintiffs' First Amended Master Complaint at this time.

329. through 331. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 329 through 331 of Plaintiffs' First Amended Master Complaint at this time.

## **COUNT XV** **JACK RUSSELL—NEGLIGENCE**

332. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 328 through 331 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

333. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth

Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 333 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XVI**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

334. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 328 through 331 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 334 of Plaintiffs' First Amended Master Complaint at this time.

**JACK RUSSELL TOURING, INC.**

335. through 339. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 335 through 339 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XVII**

**JACK RUSSELL TOURING, INC.—NEGLIGENCE**

340. Defendant Daniel Biechele incorporates by reference his answers Paragraphs 1 through 271 and 335 through 339 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

341. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 341 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XVIII**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

342. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 335 through 339 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

343. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 343 of Plaintiffs' First Amended Master Complaint at this time.

**PAUL WOOLNOUGH**

344. Defendant Daniel Biechele is without knowledge or information as to Paul Woolnough being a resident of the State of California and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 344 of Plaintiffs' First Amended Master Complaint at this time.

345. through 347. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 345 through 347 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XIX**  
**PAUL WOOLNOUGH—NEGLIGENCE**

348. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 344 through 347 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

349. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth

Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 349 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XX**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

350. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 344 through 347 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

351. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 351 of Plaintiffs' First Amended Master Complaint at this time.

**MANIC MUSIC MANAGEMENT, INC.**

352. Defendant Daniel Biechele is without knowledge or information as to Manic Music Management, Inc.'s corporate structure or state of incorporation and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully

declines to answer the remaining allegations contained in Paragraph 352 of Plaintiffs' First Amended Master Complaint at this time.

353. through 355. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 353 through 355 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXI**  
**MANIC MUSIC MANAGEMENT, INC.—NEGLIGENCE**

356. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 352 through 355 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

357. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 357 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXII**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

358. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1

through 271 and 352 through 355 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

359. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 359 of Plaintiffs' First Amended Master Complaint at this time.

**KNIGHT RECORDS, INC.**

360. Defendant Daniel Biechele is without knowledge or information as to the truth or falsity of Knight Records, Inc.'s state of incorporation and leaves Plaintiffs to their proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 360 of Plaintiffs' First Amended Master Complaint at this time.

361. through 363. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele

respectfully declines to answer the remaining allegations contained in Paragraphs 361 through 363 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXIII**  
**KNIGHT RECORDS, INC.—NEGLIGENCE**

364. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 360 through 363 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

365. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 365 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXIV**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

366. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 360 through 363 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

367. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully

declines to answer the remaining allegations contained in Paragraph 367 of Plaintiffs' First Amended Master Complaint at this time.

**DANIEL BIECHELE**

368. Defendant Daniel Biechele denies he is a resident of the State of California. Based on the criminal prosecution Mr. Biechele faces currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele respectfully invokes his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the allegations contained in Paragraph 368 of Plaintiffs' First Amended Master Complaint at this time.

369. through 371. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 369 through 371 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXV**  
**DANIEL BIECHELE—NEGLIGENCE**

372. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 368 through 371 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

373. Based on the criminal prosecution Defendant Daniel Biechele currently faces in

the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 373 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXVI**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

374. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 368 through 371 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

375. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 375 of Plaintiffs' First Amended Master Complaint at this time.

**ANHEUSER-BUSCH, INCORPORATED AND**  
**ANHEUSER-BUSCH COMPANIES, INCORPORATED**

376. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 376 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

377. through 384. Based on the criminal prosecution Defendant Daniel Biechele

currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 378 through 384 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXVII**  
**ANHEUSER BUSCH—NEGLIGENCE**

385. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 376 through 384 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

386. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 386 of Plaintiffs' First Amended Master Complaint at this time.

**MCLAUGHLIN & MORAN**

387. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 387 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

388. through 392. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-

653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 388 through 392 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXVIII**  
**MCLAUGHLIN & MORAN—NEGLIGENCE**

393. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 387 through 392 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

394. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 394 of Plaintiffs' First Amended Master Complaint at this time.

**WHJY, INC. AND CAPSTAR RADIO OPERATING COMPANY**

395. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 395 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

396. through 402. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to

the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 396 through 402 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXIX**  
**WHJY, INC. AND/OR CAPSTAR—NEGLIGENCE**

403. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 395 through 402 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

404. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 404 of Plaintiffs' First Amended Master Complaint at this time.

**CLEAR CHANNEL BROADCASTING, INC.**

405. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 405 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

406. through 408. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I,

Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 406 through 408 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXX**  
**CLEAR CHANNEL BROADCASTING, INC.—NEGLIGENCE**

409. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 395 through 408 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

410. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 410 of Plaintiffs' First Amended Master Complaint at this time.

**DENIS P. LAROCQUE, ANTHONY BETTENCOURT AND MALCOLM MOORE,**  
**IN HIS CAPACITY AS FINANCE DIRECTOR OF THE TOWN OF WEST WARWICK**

411. through 414. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 411 through 414 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

415. through 416. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele

respectfully declines to answer the remaining allegations contained in Paragraphs 415 through 416 of Plaintiffs' First Amended Master Complaint at this time.

417. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 417 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

418. through 423. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 418 through 423 of Plaintiffs' First Amended Master Complaint at this time.

424. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 424 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

425. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 425 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXI**  
**MALCOLM MOORE, IN HIS CAPACITY AS FINANCE DIRECTOR OF**  
**THE TOWN OF WEST WARWICK—NEGLIGENCE**

426. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 411 through 425 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

427. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 427 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXII**  
**DENIS P. LAROCQUE, FIRE INSPECTOR—NEGLIGENCE**

428. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 411 through 425 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

429. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 429 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXIII**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

430. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 411 through 425 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

431. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 431 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXIV**  
**ANTHONY BETTENCOURT—NEGLIGENCE**

432. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 411 through 425 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

433. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 433 of Plaintiffs' First Amended Master Complaint at this time.

**STATE OF RHODE ISLAND AND**  
**IRVING J. OWENS, FIRE MARSHAL**

434. Defendant Daniel Biechele is without knowledge or information of the truth or

falsity of the allegations set forth in Paragraph 434 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

435. through 436. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 435 through 436 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXV**  
**STATE OF RHODE ISLAND—NEGLIGENCE**

437. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 434 through 436 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

438. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 438 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXVI**  
**IRVING J. OWENS—NEGLIGENCE**

439. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 434 through 436 of Plaintiffs' First Amended Master Complaint as if more fully

set forth herein.

440. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 440 of Plaintiffs' First Amended Master Complaint at this time.

**BRIAN BUTLER**

441. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 441 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

442. through 444. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 442 through 444 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXVII**  
**BRIAN BUTLER—NEGLIGENCE**

445. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 441 through 444 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

446. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 446 of Plaintiffs' First Amended Master Complaint at this time.

**TVL BROADCASTING, INC.**

447. through 448. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 447 through 448 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

449. through 450. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 449 through 450 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXVIII**  
**TVL BROADCASTING, INC.—NEGLIGENCE**

451. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 279, 441 through 444 and 447 through 450 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

452. Based on the criminal prosecution Defendant Daniel Biechele currently faces in

the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 452 of Plaintiffs' First Amended Master Complaint at this time.

**STC BROADCASTING, INC.**

453. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 453 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

454. through 456. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 454 through 456 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XXXIX**  
**STC BROADCASTING, INC.—NEGLIGENCE**

457. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 279, 441 through 444 and 453 through 456 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

458. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele

has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 458 of Plaintiffs' First Amended Master Complaint at this time.

**BARRY H. WARNER**

459. through 460. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 459 through 460 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

461. through 464. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 461 through 464 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XL**  
**BARRY H. WARNER—NEGLIGENCE**

465. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 459 through 464 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

466. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth

Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 466 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLI**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

467. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 459 through 464 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

468. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 468 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLII**  
**LUNA TECH, INC.—NEGLIGENCE**

469. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 469 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

470. through 472. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to

the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 470 through 472 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLIII**  
**LUNA TECH, INC.—STRICT LIABILITY**

473. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 468 through 471 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

474. through 477. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 474 through 477 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLIV**  
**LUNA TECH, INC.—BREACH OF WARRANTY**

478. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 468 through 471 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

479. through 480. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I,

Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 479 through 480 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLV**  
**HIGH TECH SPECIAL EFFECTS, INC.—NEGLIGENCE**

481. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 481 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

482. through 484. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 482 through 484 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLVI**  
**HIGH TECH SPECIAL EFFECTS, INC.—STRICT LIABILITY**

485. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 481 through 484 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

486. through 489. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele

respectfully declines to answer the remaining allegations contained in Paragraphs 486 through 489 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLVII**  
**HIGH TECH SPECIAL EFFECTS, INC.—BREACH OF WARRANTY**

490. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 481 through 484 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

491. through 492. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 491 through 492 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLVIII**  
**AMERICAN FOAM CORPORATION—NEGLIGENCE**

493. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

494. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 494 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

495. through 498. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I,

Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 495 through 498 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT XLIX**  
**AMERICAN FOAM CORPORATION—STRICT LIABILITY**

499. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 492 through 497 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

500. through 503. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 500 through 503 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT L**  
**AMERICAN FOAM CORPORATION—BREACH OF WARRANTY**

504. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 493 through 498 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

505. through 506. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele

respectfully declines to answer the remaining allegations contained in Paragraphs 505 through 506 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LI**  
**LEGETT & PLATT INCORPORATED—NEGLIGENCE**

507. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 513 through 532 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

508. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 508 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

509. through 511. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 509 through 511 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LII**  
**LEGETT & PLATT CORPORATION—STRICT LIABILITY**

512. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 508 through 511 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

513. through 532. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to

the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 513 through 532 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LIII**  
**LEGGETT & PLATT INCORPORATED—BREACH OF WARRANTY**

533. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 513 through 532 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

534. through 535. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 534 through 535 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LIV**  
**L & P FINANCIAL SERVICES CO.—NEGLIGENCE**

536. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 541 through 560 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

537. Defendant Daniel Biechele is without information and knowledge as to the truth or falsity of L & P Financial Services Company's state of incorporation and leaves Plaintiffs to its proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele

has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 537 of Plaintiffs' First Amended Master Complaint at this time.

538. through 539. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 537 through 539 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LV**  
**L & P FINANCIAL SERVICES CO.—STRICT LIABILITY**

540. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 537 through 539 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

541. through 560. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 541 through 560 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LVI**  
**L & P FINANCIAL SERVICES CO.—BREACH OF WARRANTY**

561. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 541 through 560 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

562. through 563. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 562 through 563 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LVII**  
**GENERAL FOAM CORPORATION—NEGLIGENCE**

564. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 569 through 588 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

565. through 567. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 565 through 567 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LVIII**

**GENERAL FOAM CORPORATION—STRICT LIABILITY**

568. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 564 through 567 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

569. through 588. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 569 through 588 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LIX**  
**GENERAL FOAM CORPORATION—BREACH OF WARRANTY**

589. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 569 through 588 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

590. through 591. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 590 through 591 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LX**  
**GEFC FOAM, LLC—NEGLIGENCE**

592. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 598 through 617 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

593. Defendant Daniel Biechele is without information and knowledge as to the truth or falsity of GFC Foam, LLC's state of incorporation and leaves Plaintiffs to its proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 593 of Plaintiffs' First Amended Master Complaint at this time.

594. through 596. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 594 through 596 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXI**  
**GFC FOAM, LLC—STRICT LIABILITY**

597. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 593 through 596 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

598. through 617. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 598 through 617 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXII**  
**GFC FOAM, LLC—BREACH OF WARRANTY**

618. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 598 through 617 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

619. through 620. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 619 through 620 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXIII**  
**FOAMEX LP—SUCESSOR LIABILITY FOR GENERAL FOAM CORPORATION**

621. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 564 through 591 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

622. Defendant Daniel Biechele is without knowledge or information of the truth or

falsity of the allegations set forth in Paragraph 622 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

**COUNT LXIV**  
**FOAMEX INTERNATIONAL, INC.—LIABILITY FOR FOAMEX LP**

623. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 621 through 622 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

624. through 625. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 624 through 625 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

**COUNT LIV**  
**FMXI, INC.—LIABILITY AS GENERAL PARTNER**

626. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 621 through 622 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

627. through 628. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 627 through 628 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

**COUNT LXVI**  
**PMC, INC.**

629. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 564 through 591 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

630. through 631. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 630 through 631 of Plaintiffs' First

Amended Master Complaint and leaves Plaintiffs to their proof thereof.

**COUNT LXVII**  
**PMC GLOBAL, INC.**

632. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 629 through 631 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

633. through 634. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 633 through 634 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

**COUNT LXVIII**  
**JBL INCORPORATED.f/k/a James B. Lansing Sound,**  
**Incorporated d/b/a JBL Professional—NEGLIGENCE**

635. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 635 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

636. through 640. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 636 through 640 of Plaintiffs' First Amended Master Complaint at this time.

641. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 641 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

642. through 643. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 642 through 643 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXIX**  
**JBL INCORPORATED—STRICT LIABILITY**

644. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 635 through 643 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

645. through 648. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 645 through 648 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXX**  
**JBL INCORPORATED—BREACH OF WARRANTY**

649. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 635 through 643 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

650. through 651. Based on the criminal prosecution Defendant Daniel Biechele

currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 650 through 651 of Plaintiffs' First Amended Master Complaint at this time.

**ESSEX INSURANCE COMPANY, MULTI-STATE INSPECTIONS, INC. AND  
HIGH CALIBER INSPECTIONS, INC.**

652. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

653. through 655. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 653 through 655 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

656. through 659. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 656 through 659 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXI  
ESSEX INSURANCE COMPANY—NEGLIGENCE**

660. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 653 through 659 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

661. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 661 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXII**  
**MULTI-STATE INSPECTIONS, INC.—NEGLIGENCE**

662. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 653 through 659 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

663. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 663 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXIII**  
**HIGH CALIBER INSPECTIONS, INC.—NEGLIGENCE**

664. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 653 through 659 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

665. Based on the criminal prosecution Defendant Daniel Biechele currently faces in

the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 665 of Plaintiffs' First Amended Master Complaint at this time.

**UNDERWRITERS AT LLOYD'S,  
LONDON AND GRESHAM & ASSOCIATES OF R.I., INC.**

666. through 671. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraphs 666 through 671 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

672. through 675. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 672 through 675 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXIV  
UNDERWRITERS AT LLOYD'S, LONDON—NEGLIGENCE**

676. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 666 through 675 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

677. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele

has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 677 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXV**  
**GRESHAM & ASSOCIATES OF R.I., INC.—NEGLIGENCE**

678. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 666 through 675 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

679. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 679 of Plaintiffs' First Amended Master Complaint at this time.

**ABC BUS, INC. d/b/a ABC BUS LEASING, INC.**

680. Defendant Daniel Biechele is without information and knowledge as to the truth or falsity of ABC Bus, Inc.'s state of incorporation, it doing business under the name of ABC Bus Leasing, Inc. and leaves Plaintiffs to its proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island

Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 680 of Plaintiffs' First Amended Master Complaint at this time.

681. through 683. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 681 through 683 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXVI**  
**ABC BUS, INC. d/b/a BUS LEASING, INC.—NEGLIGENCE**

684. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 680 through 683 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

685. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 685 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXVII**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

686. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 680 through 683 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

687. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 687 of Plaintiffs' First Amended Master Complaint at this time.

#### **SUPERSTAR SERVICES LLC**

688. Defendant Daniel Biechele is without information and knowledge as to the truth or falsity of Superstar Services LLC's state of incorporation or its contact with the State of Rhode Island and leaves Plaintiffs to its proof thereof. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 688 of Plaintiffs' First Amended Master Complaint at this time.

689. through 691. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I,

Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 689 through 691 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXVII**  
**SUPERSTAR SERVICES LLC—NEGLIGENCE**

692. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 688 through 691 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

693. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 693 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXIX**  
**VIOLATION OF RHODE ISLAND GENERAL LAWS**  
**TITLE 9, CHAPTER 1, SECTION 2**

694. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 688 through 691 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

695. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section

13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 695 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXX**  
**"JOHN DOE" DEFENDANTS—NEGLIGENCE**

696. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

697. through 699. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraphs 697 through 699 of Plaintiffs' First Amended Master Complaint at this time.

700. Defendant Daniel Biechele is without knowledge or information of the truth or falsity of the allegations set forth in Paragraph 700 of Plaintiffs' First Amended Master Complaint and leaves Plaintiffs to their proof thereof.

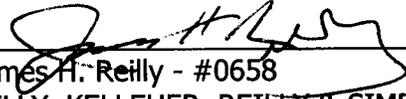
701. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 701 of Plaintiffs' First Amended Master Complaint at this time.

**COUNT LXXXI**  
**"JOHN DOE" DEFENDANTS—STRICT LIABILITY**

702. Defendant Daniel Biechele incorporates by reference his answers to Paragraphs 1 through 271 and 696 through 701 of Plaintiffs' First Amended Master Complaint as if more fully set forth herein.

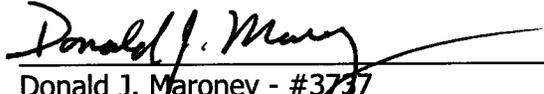
703. through 706. Based on the criminal prosecution Defendant Daniel Biechele currently faces in the matter of State of Rhode Island v. Daniel Biechele, Docket No. KI 2003-653, Mr. Biechele has no choice but to invoke his privilege against self-incrimination pursuant to the Fifth Amendments to the United States and Rhode Island Constitutions as well as Article I, Section 13 of the Rhode Island State Constitution. Based on these privileges, Mr. Biechele respectfully declines to answer the remaining allegations contained in Paragraph 703 of Plaintiffs' First Amended Master Complaint at this time.

WHEREFORE, Defendant Daniel Biechele demands entry of Judgment in his behalf as to Plaintiffs' First Amended Master Complaint.



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